

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE COMPANY,)	
JOHN HANCOCK VARIABLE LIFE INSURANCE)	
COMPANY, and INVESTORS PARTNER LIFE)	
INSURANCE COMPANY,)	
)	
Plaintiffs/Counter-Defendants,)	CIVIL ACTION NO.
)	03-12501-DPW
v.)	
)	
ABBOTT LABORATORIES,)	
)	
Defendant/Counter-Plaintiff.)	
)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Rule 26(c)(7) of the Federal Rules of Civil Procedure, the parties respectfully move for the entry of the Stipulated Protective Order filed herewith and attached hereto as Exhibit 1. In support thereof, the parties state that confidential, trade secret or other proprietary commercial information is likely to be produced in connection with this action, and that the parties wish to protect such information against disclosure as set forth in the Stipulated Protective Order.

WHEREFORE, the parties respectfully request that the Court endorse the Stipulated Protective Order as a protective order that will govern in this action. A proposed order endorsing the Stipulated Protective Order is attached hereto as Exhibit 2.

ABBOTT LABORATORIES:
By its attorneys

JOHN HANCOCK LIFE INSURANCE
COMPANY; JOHN HANCOCK
VARIABLE LIFE INSURANCE
COMPANY; and INVESTORS PARTNER
LIFE INSURANCE COMPANY:
By their attorneys

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